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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SKY LAW GROUP, a California Professional
Corporation,

Plaintiff,

vs.

PAUL PADDALAW, PLLC, a Nevada
Professional Limited Liability Company; and
DARSHPAUL S. PADDALAW, ESQ., an individual,

Defendants.

Case No. 2:23-cv-01793-CDS-MDC

**STIPULATION AND ORDER TO WITHDRAW,
WITHOUT PREJUDICE, SKY LAW’S MOTION
TO COMPEL DISCOVERY**

AND RELATED CLAIMS.

Plaintiff Sky Law Group (“Sky Law”) and Defendants Paul Padda Law, PLLC (“Padda Law”) and Darshpaul S. Padda, Esq. (“Mr. Padda” and together, the “Padda Defendants”) stipulate and agree as follows:

1. On August 14, 2024, Sky Law filed its Motion to Compel Discovery [ECF Nos. 43 & 45] (the “Motion to Compel”). According to Sky Law, it had been preparing this Motion to Compel for weeks and it reflected meet-and-confer efforts that had spanned months.

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2. After filing the Motion to Compel, on August 21, 2024, the parties received notice of U.S. Magistrate Judge Maximiliano D. Couvillier III's Standing Order & Chambers Practices (the "Standing Order") [ECF No. 46].

3. The Standing Order substantially modifies the normal practice under existing law and rules for resolving discovery disputes. As relevant here, the Standing Order requires the parties to file a "Stipulation Regarding Discovery Dispute" as a condition precedent to any motion to compel (if necessary). Standing Order § II.B.

4. On August 27, 2024, the day before the Padda Defendants' response to the Motion to Compel was due, Mr. Padda contacted Sky Law's counsel and requested that Sky Law withdraw the Motion to Compel, without prejudice, in order to follow the process outlined in the Standing Order.

5. While reserving all rights, Sky Law agrees to withdraw its Motion to Compel so that the parties may follow the discovery dispute process outlined in the Standing Order.

6. By withdrawing the Motion to Compel, Sky Law is not waiving any rights or arguments of any kind, including those raised in the Motion to Compel.

7. The Stipulation Regarding Discovery Disputes, as outlined in the Standing Order, will be filed no later than September 5, 2024.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 28th day of August, 2024.

BAILEY ♦ KENNEDY

By: /s/ Joshua P. Gilmore

DENNIS L. KENNEDY
 JOSHUA P. GILMORE
 TAYLER D. BINGHAM

Attorneys for Plaintiff/Counterdefendant
 SKY LAW GROUP

DATED this 28th day of August, 2024.

KERN LAW, LTD.
 PAUL PADDA LAW, PLLC

By: /s/ Paul S. Padda

ROBERT KERN
 DARSHPAUL S. PADDA

Attorneys for Defendants and Counterclaimant
 PAUL PADDA LAW, PLLC and
 DARSHPAUL S. PADDA, ESQ.

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 08-30-24